

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

| | | |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | CRIMINAL NO. 21-cr-30028-DWD |
| |) | |
| JARED W. SAPP, |) | |
| |) | |
| Defendant. |) | |

STIPULATION OF FACTS

The United States of America, by and through Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Peter T. Reed, Assistant United States Attorney, together with Defendant Jared W. Sapp, and his counsel James Stern, enter into the follow Stipulation of Facts pertaining to the conduct of the defendant charged in the indictment in this case and the relevant conduct of the defendant within the scope of U.S.S.G. § 1B1.3.

1. As charged in Count One of the indictment in Case No. 21-cr-30028-DWD, on or about April 22, 2020, in Madison County, Illinois, Defendant Sapp manufactured counterfeit bills (Federal Reserve Notes) in the denomination of \$20 each. Sapp manufactured the counterfeit bills with the intent to use the bills to deceive or cheat others.

2. On April 22, 2020, Sapp had a Black Epson XP-830 printer/scanner, a Black Canon Pixma printer/scanner, and a number of counterfeit \$20 Federal Reserve Notes in the trunk of his vehicle.

3. On April 22, 2020, Sapp had possession of a dangerous weapon, a BB gun, in connection with the manufacturing of counterfeit currency.

4. As charged in Count Two of the indictment, on or about November 17, 2019, Defendant Sapp had a white envelope in his possession in Effingham County, Illinois. The

envelope contained 34 counterfeit bills—eleven \$100s, and twenty-three \$20s—for a total of \$1,560 in counterfeit currency.

5. Sapp had manufactured the counterfeit bills that same day and had done so with the intent to use the counterfeit bills to deceive or cheat others.

6. From on or about 4:00am to on or about 7:00am on November 17, 2019, Sapp sent Facebook messages to J.M., asking J.M. if Sapp could use the motel room where J.M. was staying to manufacture counterfeit bills and to hide his operation. J.M. agreed, and Sapp did in fact use J.M.'s motel room to manufacture counterfeit bills and to hide his operation. He did so in J.M.'s presence. J.M. was under eighteen years of age at the time.

7. On November 8, 2019, Sapp purchased resume paper and a printer at a Walmart in Effingham County in order to manufacture counterfeit bills.

8. On or about October 13, 2019, Sapp attempted to pass a counterfeit \$20 bill at a Speedway Gas Station in Effingham County, Illinois. He also gave a counterfeit \$20 bill to a woman named M.M., who was with him, and M.M. also attempted to pass a counterfeit \$20. Sapp and M.M. were initially successful in getting change for the counterfeit bills, but the clerk later identified the bills as counterfeit and confronted Sapp and M.M. A counterfeit detection pen proved the bills were counterfeit.

9. One of the serial numbers on the counterfeit bills from October 13, 2019, matched one of the serial numbers on one of the counterfeit bills recovered from Sapp on November 17, 2019.

10. On or about April 15, 2019, Sapp had a black charcoal pouch in his possession and control. The pouch was found to contain twenty counterfeit \$20s, three counterfeit \$50s, and three counterfeit \$10s, for a total of \$240 in counterfeit bills.

11. On or about January 28, 2018, E.B. attempted to pass a counterfeit \$20 bill in

Effingham County, Illinois. Sapp was with E.B. in her vehicle at the time, and Sapp had manufactured the counterfeit \$20 that E.B. attempted to pass.

12. On or about March 15, 2017, Sapp attempted to pass a counterfeit bill at a Taco Bell in St. Clair County, Illinois. Thirteen additional counterfeit bills were found on Sapp's person, in denominations of \$50, \$20, and \$5.

13. Sapp also used counterfeit bills to pay for used goods on websites or applications like "letgo.com" and "craigslist.com."

14. Law enforcement have recovered counterfeit bills manufactured by Sapp on other occasions as well.

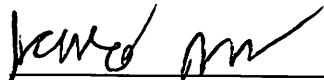
15. Altogether, law enforcement has recovered at least 201 counterfeit bills manufactured by Sapp in denominations of \$50, \$20, \$10, and \$5. These 201 counterfeit bills had a face value of \$4,715.00.

16. Sapp stipulates that the facts set forth in this Stipulation of Facts prove beyond a reasonable doubt that he is guilty of the crimes charged in Counts One and Two.

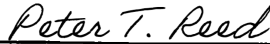
17. Sapp stipulates that venue is proper in the Southern District of Illinois for Counts One and Two.

SO STIPULATED:

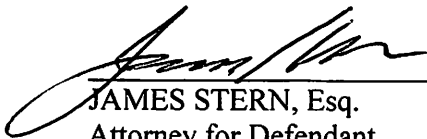
STEVEN D. WEINHOFET
United States Attorney



JARED W. SAPP
Defendant



PETER T. REED
Assistant United States Attorney



JAMES STERN, Esq.
Attorney for Defendant

Date: 4-29-2021

Date: 5-12-2021